

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: ASBESTOS PRODUCTS
LIABILITY LITIGATION (NO.VI)**

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§ Civil Action No. MDL 875

This Document Relates To:

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

**BARBARA ANNE ANDERSON,
Plaintiff,**

v.

**ALFA LAVAL, INC., et al.
Defendants.**

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§ Civil Action No. 3:07-CV-00068-HEH
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MOTION FOR SUMMARY JUDGMENT

COMES NOW the Defendants, Bondex International, Inc., RPM, Inc. and RPM, International, Inc., (collectively, for purposes of this Motion only, "Bondex"), by counsel, pursuant to the scheduling order entered herein and Rule 56 of the Federal Rules of Civil Procedure and moves this Court for an Order granting Defendants complete summary judgment on the grounds that there is no genuine issue as to any material fact and that Defendants are entitled to judgment as a matter of law. Plaintiff has disclaimed all causes of action and/or any recovery for injuries occurring in federal enclave. With the exception of three locations, Plaintiff's alleged asbestos exposure to products allegedly manufactured by Defendants, or Defendants' successors, all occurred within a federal enclave, and therefore, those claims are waived. With regard to the remaining

locations where Plaintiff worked, she has failed to produce sufficient facts to establish that she was exposed to any product manufactured by Defendants at any of those three locations. Defendants rely upon their Brief in Support of Motion for Summary Judgment filed simultaneously herewith.

WHEREFORE, Defendants respectfully request that this Court enter an Order granting them summary judgment and dismissing this action, with prejudice, and awarding them costs expended on their behalf.

BONXEX INTERNATIONAL, INC.,
RPM, INC. AND RPM, INTERNATIONAL, INC.

By: _____ /s/ _____

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing has been filed with the Court electronically and on all known counsel of record on this 21st day of May, 2009.

_____ /s/ _____

Timothy S. Brunick